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David M. LeMay

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re : **Chapter 11 Cases**
:
LEHMAN BROTHERS HOLDINGS INC. et al. : **08-13555 (JMP)**
:
Debtors. : **Jointly Administered**

**CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746
REGARDING CHADBOURNE & PARKE LLP'S MOTION TO
WITHDRAW AS COUNSEL FOR CREDICAN, C.A.**

TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [Docket No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. On July 3, 2012, Chadbourne & Parke LLP ("Chadbourne") filed a Motion to Withdraw as Counsel for Credican, C.A. ("Credican") in the above-captioned bankruptcy proceedings (the "Lehman Proceedings").¹

2. In accordance with the Second Amended Case Management Order, **July 11, 2012 at 4:00 p.m. (Prevailing Eastern Time)** was established as the deadline for the parties to object or file a response to the Motion (the "Objection Deadline"). The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections have been filed prior to the relevant Objection Deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Objection Deadline has now passed and, to the best of my knowledge, no objections or other responsive pleadings to the Motion have been filed with the Court on the docket of the Lehman Proceedings in accordance with the procedures set forth in the Second Amended Case Management Order nor has any objection or other responsive pleading with respect to the Motion been served on Chadbourne.

4. Accordingly, for the reasons set forth in the Motion, Chadbourne respectfully requests that the proposed Order granting the Motion, annexed hereto as Exhibit A and unmodified since the filing of the Motion, be entered in accordance with the procedures described in the Second Amended Case Management Order.

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion to Withdraw as Counsel for Credican, C.A.

I declare that the foregoing is true and correct.

Dated: New York, New York
July 11, 2012

CHADBOURNE & PARKE LLP

By: /s/ David M. LeMay
David M. LeMay

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EXHIBIT A
(Proposed Order)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re : Chapter 11 Cases
:
LEHMAN BROTHERS HOLDINGS INC. et al., : 08-13555 (JMP)
:
Debtors. : Jointly Administered

x

ORDER GRANTING MOTION TO WITHDRAW AS COUNSEL FOR CREDICAN, C.A.

Upon consideration of the Motion to Withdraw as Counsel for Credican, C.A. (the “Motion”) filed by Chadbourne & Parke LLP pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules for the Southern District of New York; and due and proper notice of the Motion having been provided in accordance with the procedures set forth in the Second Amended Case Management Order entered June 17, 2010 governing case management and administrative procedures [Docket No. 9635]; and no objection having been filed by the objection deadline of July 11, 2012; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED, that the Motion is granted.

It is further ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation and/or interpretation of this order.

Dated: New York, New York
_____, 2012

HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE